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Attorneys for Defendants: The Related Companies, L.P., Related Management Company, L.P., The Related Realty Group, Inc., and Related BPC Associates, Inc.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE: WORLD TRADE CENTER LOWER : 2

MANHATTAN DISASTER SITE LITIGATION : TH

EDGAR ORELLANA :

V.
THE RELATED COMPANIES, L.P.,
RELATED MANAGEMENT COMPANY, L.P.,
THE RELATED DEAL TY CROUP, INC., and

THE RELATED REALTY GROUP, INC., and : 07 GRELATED BPC ASSOCIATES, INC.

21 MC 102 (AKH)

THE RELATED
DEFENDANTS'
ADOPTION OF
ANSWER TO
MASTER COMPLAINT

07 cv 05398

PLEASE TAKE NOTE THAT Defendants, The Related Companies, L.P., Related Management Company, L.P., The Related Realty Group, Inc., and Related BPC Associates, Inc., ("Related Defendants") by their attorneys, London Fischer, LLP, as and for their responses to the allegations set forth in the Complaint by Adoption (Check-off Complaint) Related to the Master Complaint filed in the above-referenced action, hereby adopt The Related Defendants Answer to Master Complaint, dated August 3, 2007, which was filed in the matter of In re World Trade Center lower Manhattan Disaster Site Litigation, 21 MC 102 (AKH).

WHEREFORE, the Related Defendants demand judgment dismissing the abovecaptioned action as against each of them, together with their costs and disbursements.

Dated: New York, New York January 23, 2008

LONDON FISCHER LLP

Gillian Hines Kost (GK-2880)

59 Maiden Lane

New York, New York 10038

(212) 972-1000

Attorneys for Defendants: The Related Companies, L.P.,

Related Management Company, L.P., The Related Realty Group, Inc., and

Related BPC Associates, Inc.

TO:

Battery Park City Authority c/o Wilson Elser, et al. 3 Gannett Drive White Plains, New York 10604

Robert J. Higgins Dickstein Shapiro Morin & Oshinsky LLP, 2101 L Street N.W. Washington, DC 20037

Lionshead 110 Development, LLC Eschen, Frenkle & Weisman, LLP 20 West Main Street Bayshore, NY 11706

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CERTIFICATE OF SERVICE

I hereby certify that I caused a true copy of The Related Defendants' Notice of Adoption of Answer to Master Complaint was served via First Class Mail on the day of January 23, 2008, upon the following:

> Battery Park City Authority c/o Wilson Elser, et al. 3 Gannett Drive White Plains, NY 10604

Robert J. Higgins Dickstein Shapiro Morin & Oshinsky LLP, 2101 L Street N.W. Washington, DC 20037

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The undersigned further certifies that on January 23, 2008, I caused the Notice of Adoption of Answer to Master Complaint to be electronically served via the Court's ECF System.

Dated: January 23, 2008

Gillian Hines Kost

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